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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

J.C., *et al.*,

Plaintiffs,

v.

KRISTI NOEM, Secretary of the United States  
Department of Homeland Security, *et al.*,  
a, *et al.*,

Defendants.

Case No. 4:25-cv-03502 JSW

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS' RESPONSE TO PLAINTIFFS'  
COMPLAINT; AND [PROPOSED] ORDER**

Plaintiffs and Defendants hereby stipulate and respectfully request the Court to extend the deadline for Defendants' response to Plaintiffs' complaint. Defendants will file their response on or before July 23, 2025. The parties make this request because Defendants need a brief period of additional time to prepare their response to the complaint.

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1 Dated: June 23, 2025

Respectfully submitted,<sup>1</sup>

2 CRAIG H. MISSAKIAN  
3 United States Attorney

4 /s/ Elizabeth D. Kurlan  
5 ELIZABETH D. KURLAN  
6 Assistant United States Attorney  
7 Attorneys for Defendants

8 Dated: June 23, 2025

9 /s/ Zachary Nightingale  
10 ZACHARY NIGHTINGALE  
11 JOHN N. SINODIS  
12 Attorneys for Plaintiffs

13 **[PROPOSED] ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their response to Plaintiffs'  
15 complaint by July 23, 2025.

16 Date:

17 JEFFREY S. WHITE  
18 United States District Judge  
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27 <sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.

**DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On April 22, 2025, Plaintiffs filed a complaint in which they challenge the termination of their records in the Student Exchange and Visitor Information System. *See* Dkt. No. 1. Our office was served with the complaint on April 23, 2025.

3. On June 18, 2025, I contacted Plaintiffs' counsel regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiffs consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 18, 2025

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney